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CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2013 Grand Jury

CR13-0642

UNITED STATES OF AMERICA,)	CR No.
)	
Plaintiff,)	<u>I N D I C T M E N T</u>
)	
v.)	[18 U.S.C. § 879: Threats
)	Against Former Presidents and
LUIS RICARDO RODRIGUEZ,)	Certain Other Persons; 18 U.S.C.
)	§ 871: Threats Against the
Defendant.)	President; 18 U.S.C. § 878:
)	Threats Against Foreign
)	Officials]
)	

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 879(a)(1)]

On or about April 21, 2012, in Los Angeles County, within the Central District of California, defendant LUIS RICARDO RODRIGUEZ knowingly and willfully threatened to kill and inflict bodily harm upon a former President of the United States, that is, defendant RODRIGUEZ stated in a public website post that he wanted to kill former President William J. Clinton.

COUNT TWO

[18 U.S.C. § 879(a)(1)]

On or about April 21, 2012, in Los Angeles County, within the Central District of California, defendant LUIS RICARDO RODRIGUEZ knowingly and willfully threatened to kill and inflict bodily harm upon a member of the immediate family of a former President of the United States, that is, defendant RODRIGUEZ stated in a public website post that he wanted to kill Hillary Rodham Clinton, wife of former President William J. Clinton.

COUNT THREE

[18 U.S.C. § 879(a)(1)]

On or about May 10, 2012, in Los Angeles County, within the Central District of California, defendant LUIS RICARDO RODRIGUEZ knowingly and willfully threatened to kill and inflict bodily harm upon a member of the immediate family of a former President of the United States, that is, defendant RODRIGUEZ stated in an email that he would kill Hillary Rodham Clinton, wife of former President William J. Clinton.

COUNT FOUR

[18 U.S.C. § 879(a)(1)]

On or about May 11, 2012, in Los Angeles County, within the Central District of California, defendant LUIS RICARDO RODRIGUEZ knowingly and willfully threatened to kill and inflict bodily harm upon a member of the immediate family of a former President of the United States, that is, defendant RODRIGUEZ stated in an email that he wanted to kill Hillary Rodham Clinton, wife of former President William J. Clinton.

COUNT FIVE

[18 U.S.C. § 879(a)(1)]

On or about May 11, 2012, in Los Angeles County, within the Central District of California, defendant LUIS RICARDO RODRIGUEZ knowingly and willfully threatened to kill and inflict bodily harm upon a former President of the United States, that is, defendant RODRIGUEZ stated in an email that he wanted to kill former President William J. Clinton.

COUNT SIX

[18 U.S.C. § 879(a)(1)]

On or about May 11, 2012, in Los Angeles County, within the Central District of California, defendant LUIS RICARDO RODRIGUEZ knowingly and willfully threatened to kill and inflict bodily harm upon a former President of the United States, that is, defendant RODRIGUEZ stated in an email that he wanted to kill former President George W. Bush.

COUNT SEVEN

[18 U.S.C. § 871]

On or about May 11, 2012, in Los Angeles County, within the Central District of California, defendant LUIS RICARDO RODRIGUEZ knowingly and willfully threatened to take the life of and inflict bodily harm upon the President of the United States, that is, defendant RODRIGUEZ stated in an email that he wanted to kill President Barack H. Obama.

COUNT EIGHT

[18 U.S.C. § 879(a)(1)]

On or about May 19, 2012, in Los Angeles County, within the Central District of California, defendant LUIS RICARDO RODRIGUEZ knowingly and willfully threatened to kill and inflict bodily harm upon a member of the immediate family of a former President of the United States, that is, defendant RODRIGUEZ stated in an email that he wanted to kill Hillary Rodham Clinton, wife of former President William J. Clinton.

COUNT NINE

[18 U.S.C. § 879(a)(1)]

On or about May 19, 2012, in Los Angeles County, within the Central District of California, defendant LUIS RICARDO RODRIGUEZ knowingly and willfully threatened to kill and inflict bodily harm upon a former President of the United States, that is, defendant RODRIGUEZ stated in an email that he wanted to kill former President William J. Clinton.

COUNT TEN

[18 U.S.C. § 871]

On or about May 23, 2012, in Los Angeles County, within the Central District of California, defendant LUIS RICARDO RODRIGUEZ knowingly and willfully threatened to kill and inflict bodily harm upon the President of the United States, that is, defendant RODRIGUEZ stated in an email that he would kill President Barak H. Obama.

COUNT ELEVEN

[18 U.S.C. § 879(a)(1)]

On or about May 23, 2012, in Los Angeles County, within the Central District of California, defendant LUIS RICARDO RODRIGUEZ knowingly and willfully threatened to kill and inflict bodily harm upon a former President of the United States, that is, defendant RODRIGUEZ stated in an email that he would kill former President William J. Clinton.

COUNT TWELVE

[18 U.S.C. § 879(a)(1)]

On or about May 23, 2012, in Los Angeles County, within the Central District of California, defendant LUIS RICARDO RODRIGUEZ knowingly and willfully threatened to kill and inflict bodily harm upon a member of the immediate family of a former President of the United States, that is, defendant RODRIGUEZ stated in an email that he would kill Hillary Rodham Clinton, wife of former President William J. Clinton.

COUNT THIRTEEN

[18 U.S.C. § 878(a)]

On or about May 23, 2012, in Los Angeles County, within the Central District of California, defendant LUIS RICARDO RODRIGUEZ knowingly and willfully threatened to make a violent attack upon the official premises of foreign officials that would likely endanger their persons and liberty, that is, defendant RODRIGUEZ stated in an email that he would attack the Consulate of Israel in Los Angeles with a deadly and dangerous weapon, namely, a fire-bomb, in violation of Section 112 of Title 18 of the United States Code.

COUNT FOURTEEN

[18 U.S.C. § 879(a)(1)]

On or about May 23, 2012, in Los Angeles County, within the Central District of California, defendant LUIS RICARDO RODRIGUEZ knowingly and willfully threatened to kill and inflict bodily harm upon a member of the immediate family of a former President of the United States, that is, defendant RODRIGUEZ stated in an email that he would kill Chelsea Clinton, daughter of former President William J. Clinton.

COUNT FIFTEEN

[18 U.S.C. § 879(a)(1)]

On or about May 23, 2013, in Los Angeles County, within the Central District of California, defendant LUIS RICARDO RODRIGUEZ knowingly and willfully threatened to kill and inflict bodily harm upon a member of the immediate family of a former President of the United States, that is, defendant RODRIGUEZ stated in an email that he would kill Barbara Bush and Jenna Bush, daughters of former President George W. Bush.

COUNT SIXTEEN

[18 U.S.C. § 879(a)(2)]

On or about May 23, 2012, in Los Angeles County, within the Central District of California, defendant LUIS RICARDO RODRIGUEZ knowingly and willfully threatened to kidnap, kill and inflict bodily harm upon a member of the immediate family of the President of the United States, that is, defendant RODRIGUEZ stated in an email that he would kidnap and kill S.O. and M.O., daughters of President Barack H. Obama.

COUNT SEVENTEEN

[18 U.S.C. § 879(a)(1)]

On or about November 29, 2012, in Los Angeles County,
within the Central District of California, defendant LUIS
RICARDO RODRIGUEZ knowingly and willfully threatened to kill and
inflict bodily harm upon a former President of the United
States, that is, defendant RODRIGUEZ stated in an email that he
wanted to kill former President William J. Clinton.

COUNT EIGHTEEN

[18 U.S.C. § 879(a)(1)]

On or about November 29, 2012, in Los Angeles County,
within the Central District of California, defendant LUIS
RICARDO RODRIGUEZ knowingly and willfully threatened to kill and
inflict bodily harm upon a member of the immediate family of a
former President of the United States, that is, defendant
RODRIGUEZ stated in an email that he wanted to kill Hillary
Rodham Clinton, wife of former President William J. Clinton.

COUNT NINETEEN

[18 U.S.C. § 879(a)(1)]

On or about November 29, 2012, in Los Angeles County, within the Central District of California, defendant LUIS RICARDO RODRIGUEZ knowingly and willfully threatened to kill and inflict bodily harm upon a former President of the United States, that is, defendant RODRIGUEZ stated in an email that he wanted to kill former President George W. Bush.

COUNT TWENTY

[18 U.S.C. § 871]

On or about November 29, 2012, in Los Angeles County,
within the Central District of California, defendant LUIS
RICARDO RODRIGUEZ knowingly and willfully threatened to take the
life of and inflict bodily harm upon the President of the United
States, that is, that defendant LUIS RICARDO RODRIGUEZ stated in
an email that he wanted to kill President Barack H. Obama.

COUNT TWENTY-ONE

[18 U.S.C. § 879(a)(1)]

On or about December 4, 2012, in Los Angeles County, within the Central District of California, defendant LUIS RICARDO RODRIGUEZ knowingly and willfully threatened to kill and inflict bodily harm upon a member of the immediate family of a former President of the United States, that is, defendant RODRIGUEZ stated in an email that he wanted to kill Chelsea Clinton, daughter of former President William J. Clinton.

COUNT TWENTY-TWO

[18 U.S.C. § 879(a)(1)]

On or about December 4, 2012, in Los Angeles County, within the Central District of California, defendant LUIS RICARDO RODRIGUEZ knowingly and willfully threatened to kill and inflict bodily harm upon a former President of the United States, that is, defendant RODRIGUEZ stated in an email that he wanted to kill former President William J. Clinton.

COUNT TWENTY-THREE

[18 U.S.C. § 879(a)(1)]

On or about December 4, 2012, in Los Angeles County, within the Central District of California, defendant LUIS RICARDO RODRIGUEZ knowingly and willfully threatened to kill and inflict bodily harm upon a member of the immediate family of a former President of the United States, that is, defendant RODRIGUEZ stated in an email that he wanted to kill Hillary Rodham Clinton, wife of former President William J. Clinton.

COUNT TWENTY-FOUR

[18 U.S.C. § 879(a)(1)]

On or about December 4, 2012, in Los Angeles County, within the Central District of California, defendant LUIS RICARDO RODRIGUEZ knowingly and willfully threatened to kill and inflict bodily harm upon a member of the immediate family of a former President of the United States, that is, defendant RODRIGUEZ stated in an email that he wanted to kill "the daughters" of former President George W. Bush.

COUNT TWENTY-FIVE

[18 U.S.C. § 879(a)(2)]

On or about December 4, 2012, in Los Angeles County, within the Central District of California, defendant LUIS RICARDO RODRIGUEZ knowingly and willfully threatened to kill and inflict bodily harm upon a member of the immediate family of the President of the United States, that is, defendant RODRIGUEZ stated in an email that he wanted to kill S.O. and M.O., daughters of President Barack H. Obama.

A TRUE BILL

15/

Foreperson

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